

*UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION*

UNITED STATES OF AMERICA

versus

GIOVANI ALECIO

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CRIMINAL DOCKET 4:17-CR-651-02

JUDGE GRAY MILLER

DEFENDANT'S MOTION FOR BOND

TO THE HONORABLE GRAY MILLER:

Giovani Alecio asks the Court to set conditions of release and shows the following supporting this request:

1. Alecio has been in custody since November 7, 2017.
2. He pleaded guilty on March 14, 2019, to illegal dealing in firearms in violation of 18 U.S.C. § 922(a)(1)(A). The maximum punishment for this offense is five years imprisonment (60 months).
3. With credit for time served, credit for good behavior, and the time he would serve in a halfway house, Alecio has served most - if not all - of the sentence he will likely receive for his conviction
4. Alecio is currently scheduled to be sentenced on February 13, 2020. However, this hearing is likely to be continued because the PSR has not been completed.
5. Alecio has a variety of family members who are willing to sign on a bond to guarantee he does not pose a danger to the community, and appears for all remaining court proceedings. These individuals include his mother, who is a U.S. citizen with no criminal record, and owns her home; his step-father, who has no criminal record, and owns a roofing business at which Alecio has worked in the past and could again work there if he is released; and his aunt, who has no criminal record.

Conclusion

6. Alecio will soon be at risk of serving more time than would be required by the maximum possible sentence in this matter. The Court could impose a variety of available conditions which would meet the requirements of the Bail Reform Act.

7. For the foregoing reasons, Alecio respectfully requests the Court set conditions of release on bond pending sentencing.

Respectfully submitted,

/s/ David Adler

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Attorney for Defendant,
Giovani Alecio

CERTIFICATE OF SERVICE

A copy of this motion was served on the Assistant U.S. Attorney via CM/ECF on January 30, 2020.

/s/ David Adler

David Adler

CERTIFICATE OF CONFERENCE

The AUSA is unopposed to this motion.

/s/ David Adler

David Adler

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ORDER ON DEFENDANT'S MOTION FOR BOND

Alecio's motion for bond is:

Granted,

Denied.

Signed on _____, 2020.

Gray Miller
United States District Judge